

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	Docket Number: 08 CR 354
Plaintiff,)	
)	Presiding Judge:
v.)	The Honorable Judge Morton Denlow
)	
ADEGBITE OLAMREWAJU ADEYEMO,)	
Defendant.)	

MOTION FOR PRETRIAL RELEASE

PURSUANT TO 18 U.S.C. § 3142(a)(2), MR. ADEYEMO, BY HIS COUNSEL, PAUL CAMARENA, RESPECTFULLY moves this Honorable Court to order the United States to release Mr. Adeyemo pretrial. In support of his motion, Mr. Adeyemo states as follows:

The United States' only charge against Mr. Adeyemo has a maximum sentence of only two years, and, thus, there is no presumption that this Honorable Court should order the United States Marshal to detain Mr. Adeyemo. (R. 10 and 8 U.S.C. § 1326; see also 18 U.S.C. § 3142(e).) Of course, 18 U.S.C. § 3142(g) requires this Honorable Court to consider Mr. Adeyemo's danger to the community and the future appearance of Mr. Adeyemo. However, Mr. Adeyemo would submit that those factors support his motion.

Danger to the Community.

Mr. Adeyemo's criminal history consists only of one 25 year old white-collar offense. (Pretrial Services Report, p. 3.)

Future appearance of Mr. Adeyemo.

While Mr. Adeyemo has recently resided in Nigeria and his wife and 9 year old child currently reside in Nigeria, Mr. Adeyemo also has significant ties to the United States community. Mr. Adeyemo has three children who reside in the United States. (Pretrial Report, p. 1.) Also, Mr. Adeyemo is legally residing in the United States, although he is currently under removal proceedings. (Pretrial Report, p. 2.) In addition, Mr. Adeyemo is very close to a United States citizen, Mr. Gregory Salako, who owns a home with equity totaling \$ 286,783.45¹, and Mr. Salako would execute an agreement to forfeit, should Mr. Adeyemo fail to appear, this property.

¹ Exhibit 1: Appraisal, p. 3, Market Value: \$ 465,000.00.
Exhibit 2: Mortgage Statement, Unpaid Principle Balance: \$ 178,216.55.

WHEREFORE, Mr. Adeyemo respectfully moves this Honorable Court to order the United States Marshal to release pretrial Mr. Adeyemo to the custody of Mr. Salako and to order that Mr. Adeyemo submit to Pretrial Services' home incarceration with electronic monitoring.

Respectfully submitted,
Adegbite Adeyemo's Counsel
North & Sedgwick L.L.C.

By: /s/ Paul Camarena
Paul Camarena, Esq.
333 W. North, No. 150
Chicago, IL 60610
PaulCamarena@PaulCamarena.Com
(312) 493-7494
(312) 602-4945 (facsimile)

Client: GREGORY SALAKO
1812 S. STATE ST, #14
CHICAGO, IL 60616
312-882-1670

Item	Total
------	-------

APPRAISAL FEE FOR SERVICES RENDERED \$ 250.00
PAID -\$250.00

Borrower: SALAKO, GREGORY
1812 S. STATE ST.
CHICAGO, IL 60616

TERMS: DUE UPON RECEIPT
A LATE PAYMENT OF 1.5% WILL BE CHARGED MONTHLY
TO ALL UNPAID BALANCES.

Please detach and include the bottom portion with your payment... Thank You!

Total: \$

Inv Date	Insp Date	Appraiser	Client Case #	File #	Client Phone #
07/11/2008	07/09/2008			08070020	

FROM:

GREGORY SALAKO
1812 S. STATE ST, #14
CHICAGO, IL 60616
312-882-1670

PROPERTY:

Borrower: SALAKO, GREGORY
1812 S. STATE ST.
CHICAGO, IL 60616

Amount Due

\$ _____

TO:

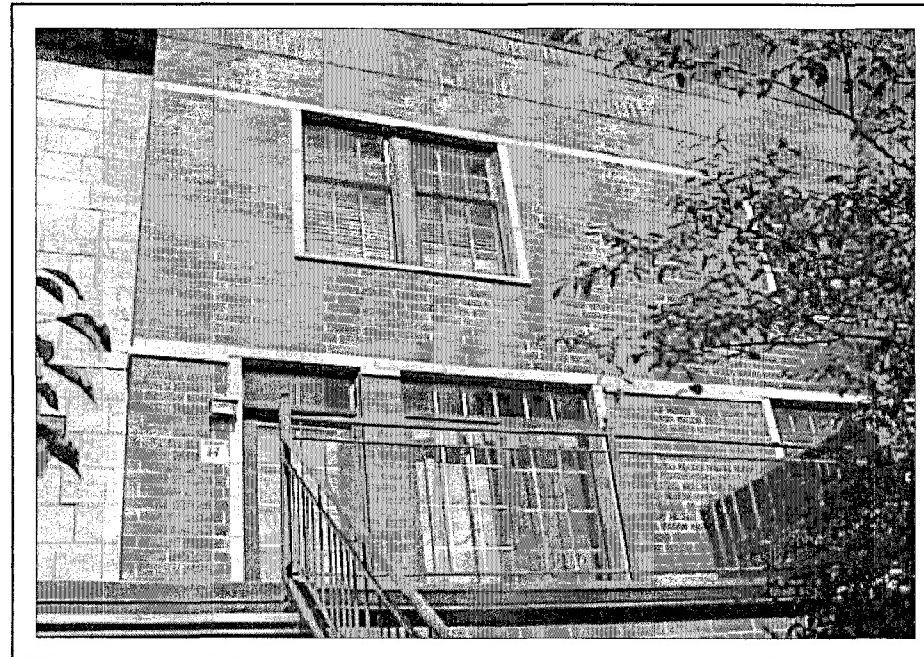
Attention:

Val-U-Rite Appraisal Company
P.O. Box 5587
Buffalo Grove, IL 60089

Amount Enclosed

\$ _____

Balance Due upon receipt of Invoice
Please return this portion with your payment. Thank You!



SUMMARY APPRAISAL REPORT REPORT

OF THE REAL PROPERTY LOCATED AT

1812 S. STATE ST.
CHICAGO, IL 60616

for

GREGORY SALAKO
1812 S. STATE ST, #14
CHICAGO, IL 60616
312-882-1670

as of

07/09/2008

by

VAL-U-RITE APPRAISAL COMPANY
P.O. Box 5587
Buffalo Grove, IL 60089

THIS SUMMARY APPRAISAL IS INTENDED FOR USE BY THE LENDER/CLIENT FOR A MORTGAGE FINANCE TRANSACTION ONLY.

Property Address 1812 S. STATE ST.			City CHICAGO			State IL Zip Code 60616		
Legal Description REFER TO TITLE POLICY						County COOK		
Assessor's Parcel No. 17-21-409-034-1014			Tax Year 2006 R.E. Taxes \$ 3,146.00 Special Assessments \$			N/A		
Borrower SALAKO, GREGORY Current Owner SALAKO			Occupant X Owner Tenant Vacant					
Neighborhood or Project Name DEARBORN VILLAGE			Project Type PUD X Condominium HOAS			369.00 /Mo.		
Sales Price \$ MRKT. VALUE Date of Sale N/A			Description / \$ amount of loan charges/concessions to be paid by seller N/A					
Property rights appraised X Fee Simple Leasehold			Map Reference SMSA1600			Census Tract 3302.003		

Note: Race and the racial composition of the neighborhood are not appraisal factors.

Location X Urban Suburban Rural	Property Values Increasing X Stable Declining	Single family housing PRICE (\$/000) AGE (yrs)	Condominium housing PRICE (\$/000) (if applic.) AGE (yrs)
Built up X Over 75% 25-75% Under 25%	Demand/supply Shortage X In balance Over supply	28	NEW76 Low
Growth rate Rapid X Stable Slow	Marketing time Under 3 mos. X 3-6 mos. Over 6 mos.	350	80400 Low
Neighborhood boundaries THE SUBJECT IS BOUNDED TO THE NORTH BY CONGRESS PRKY, TO THE EAST BY LAKE MICHIGAN, TO THE SOUTH BY 31ST ST. AND TO THE WEST BY HALSTED ST.		High	100+1,000 High 100+1,000
		Predominant	Predominant
		350	80400 80

Dimensions COMMON AREA Site area COMMON AREA Shape N/A

Specific zoning classification and description PD 664 PLANNED UNIT DEVELOPMENT

Zoning compliance X Legal Legal nonconforming (Grandfathered use) Illegal, attach description No zoning

Highest and best use of subject property as improved (or as proposed per plans and specifications): X Present use Other use, attach description.

Utilities	Public	Other	Public	Other	Off-site improvements	Type	Public	Private
Electricity	X		Water	X	Street	ASPHALT	X	
Gas	X		Sanitary sewer	X	Alley	NONE		

Are there any apparent adverse site conditions (easements, encroachments, special assessments, slide areas, etc.)? Yes X No If Yes, attach description.

Source(s) used for physical characteristics of property: X Interior and exterior inspection <input type="checkbox"/> Exterior inspection from street <input type="checkbox"/> Previous appraisal files
X MLS X Assessment and tax records <input type="checkbox"/> Prior inspection X Property owner Other (Describe):

No. of Stories THREE Type (Det/Att.) ATT Exterior Walls BRICK/AVS Roof Surface ASPHALT Manufactured Housing Yes X No

Does the property generally conform to the neighborhood in terms of style, condition, and construction materials? X Yes No If No, attach description.

Are there any apparent physical deficiencies or conditions that would affect the soundness or structural integrity of the improvements or the livability of the property? Yes X No If Yes, attach description.

Are there any apparent adverse environmental conditions (hazardous wastes, toxic substances, etc.) present in the improvements, on the site, or in the immediate vicinity of the subject property? Yes X No If Yes, attach description.

I researched the subject market area for comparable listings and sales that are the most similar and proximate to the subject property.
 My research revealed a total of 26 sales ranging in sales price from \$ 420,000 to \$ 532,500.
 My research revealed a total of 26 listings ranging in list price from \$ 442,000 to \$ 544,500.

The analysis of the comparable sales below reflects market reaction to significant variations between the sales and the subject property.

FEATURE	SUBJECT	SALE 1	SALE 2	SALE 3
Address	1812 S. STATE ST. CHICAGO	1812 S. STATE CHICAGO	20 W. 15TH CHICAGO	1812 S. DEARBORN CHICAGO
Proximity to Subject		SAME SUBDIVISION	0.30 MILES N	SAME SUBDIVISION
Sales Price	\$ MRKT. VALUE \$ 0.00	\$ 487,500	\$ 420,000	\$ 467,500
Price/Gross Liv. Area	\$ 0.00 Sq. Ft. 243.75	\$ 283.40 Sq. Ft.	\$ 233.75 Sq. Ft.	
Data & Verification Sources	MLSNI #06705373/RECORDER	MLSNI #06601945/RECORDER	MLSNI #06771429/RECORDER	
VALUE ADJUSTMENTS	DESCRIPTION	DESCRIPTION + (-) \$ Adjustment	DESCRIPTION + (-) \$ Adjustment	DESCRIPTION + (-) \$ Adjustment
Sales or Financing Concessions	CONVENTIONAL NO CONCESS.	CONVENTIONAL NO CONCESS.	CONVENTIONAL NO CONCESS.	
Date of Sale/Time	11/07	NO ADJ 02/08		04/08
Location	URBAN	URBAN	URBAN	URBAN
Site	COMMON AREA	COMMON AREA	SIMILAR	NO ADJ COMMON AREA
View	AVERAGE	AVERAGE	AVERAGE	AVERAGE
Design (Style)	CONDO/TWNHSE	CONDO/TWNHSE	TOWNHOUSE	NO ADJ CONDO/TWNHSE
Actual Age (Yrs.)	1998	1998	1990	1998
Condition	GOOD	GOOD	GOOD	GOOD
Above Grade	Total Bdrms 3 Bath 2	Total Bdrms 3 Bath 2	Total Bdrms 3 Bath 2	Total Bdrms 3 Bath 2
Room Count	7 3 2	6 3 2	6 3 2	7 3 2
Gross Living Area	1,968 Sq. Ft.	2000+/- Sq. Ft.	1,482 Sq. Ft.	24,500 2000+/- Sq. Ft.
Basement & Finished Rooms Below Grade	NO BASEMENT N/A	NO BASEMENT N/A	NO BASEMENT N/A	NO BASEMENT N/A
Garage/Carport	1 CAR GARAGE	1 GAR/1 OPEN	-20,000 1 CAR OPEN	20,000 1 CAR GARAGE
Net Adj. (total)	+ X - \$ -20,000	X + - \$ 44,500	+ - \$	
Adjusted Sales Price of Comparables	GROSS 4.1% NET -4.1% \$ 467,500	GROSS 10.6% NET 10.6% \$ 464,500	GROSS 0.0% NET 0.0% \$	467,500
Date of Prior Sale	NO SALE/TRANSFERS	NO SALE/TRANSFERS PAST 12 MONTHS	NO SALE/TRANSFERS PAST 12 MONTHS	NO SALE/TRANSFERS PAST 12 MONTHS
Price of Prior Sale	\$ PAST 36 MO.	\$	\$	

Analysis of any current agreement of sale, option, or listing of the subject property and analysis of the prior sales of subject and comparables:
 OR TRANSFERS FOR THE SUBJECT PAST 36 MONTHS. COMPARABLES AS INDICATED.

Summary of sales comparison and value conclusion: SEE ADDENDUM.

This appraisal is made X "as is", subject to completion per plans and specifications on the basis of a hypothetical condition that the improvements have been completed, or subject to the following repairs, alterations or conditions:

BASED ON AN EXTERIOR INSPECTION FROM THE STREET OR AN X INTERIOR AND EXTERIOR INSPECTION, I ESTIMATE THE MARKET VALUE, AS DEFINED, OF THE REAL PROPERTY THAT IS THE SUBJECT OF THIS REPORT TO BE \$ 465,000, AS OF 07/09/2008

10 CH. PAGE 1 OF 3 Fannie Mae Form 2055 9-96



Return Mail Operations
PO Box 14411
Des Moines, IA 50306-3411

2292/000000/002292 000 01 AMW66 708
GREGORY A SALAKO
1812 S STATE ST APT 14
CHICAGO IL 60616-1696



Monthly Mortgage Statement

Statement Date 03/17/08
Loan Number 0036018653

Customer Service

Online
wellsfargo.com

Telephone (866) 234-8271
TTY Deaf/Hard of Hearing (800) 934-9998

Fax (866) 278-1179

Payments PO Box 5296
Carol Stream IL 60197
Correspondence PO Box 10335
Des Moines IA 50306

Important Messages

THE COMFORTS OF HOME

We understand the important role your home has in your life. That's why you can count on us to help you realize the personal and financial rewards of homeownership. Since 1852, we've been helping Americans reach their financial goals. Today, we appreciate having the opportunity to do the same for you.

Summary

Payment (Principal and/or Interest, Escrow)	\$2,127.35	Property Address	1812 S STATE STREET CHICAGO IL 60616
Optional Product(s)	\$0.00	Unpaid Principal Balance	\$178,216.55 (Contact Customer Service for your payoff balance)
Current Monthly Payment	\$2,127.35	Interest Rate	5.250%
Overdue Payments	\$0.00	Interest Paid Year-to-Date	\$5,589.13
Unpaid Late Charge(s)	\$0.00	Taxes Paid Year-to-Date	\$1,572.76
Other Charges	\$0.00	Escrow Balance	\$1,941.67
TOTAL PAYMENT DUE 08/01/08	\$2,127.35		

Activity Since Your Last Statement

Date	Description	Total	Principal	Interest	Escrow	Late Charge	Other
03/17	*PAYMENT	\$1,080.79	\$784.43	\$262.13			
03/17	*PAYMENT	\$1,076.09	\$789.13	\$262.13			
03/17	*PAYMENT	\$1,071.40	\$793.82	\$262.13			
03/17	*PAYMENT	\$1,066.73	\$798.49	\$262.13			
03/17	*PAYMENT	\$10,636.75	\$1,062.09	\$803.13	\$262.13		
02/27	TAX PAYMENT	\$5.00-			\$5.00-	COOK CO TAX BILL FEE(4)	

*Wells Fargo Easy Pay payment has been applied. Amount shown exclusive of applicable fees.

000000/002292 AMW66 2292

Please detach and return with your payment

Loan Number	0036018653
Current Monthly Payment Due	\$2,127.35
Total Payment Due 08/01/08	\$2,127.35
After 08/16/08 Add Late Fee	\$93.26
Total Amount Due After 08/16/08	\$2,220.61



Check here and see
reverse for address
correction.

GREGORY A SALAKO

2292/000000/002292 000 01 AMW66 708

WELLS FARGO HOME MORTGAGE
PO BOX 5296
CAROL STREAM IL 60197-5296



Total Amount Enclosed
(Please do not send cash)

708 0036018653 2 10000212735022206102127350000000 00000001497843277 9